Indirect Aqueous Photolysis of Transfluthrin

Report: MRID 50119702. Hellpointner, E.. 1991. Experiments Concerning the Indirect

Photodegradation of Benfluthrin in Aqueous Solution. Unpublished study performed, sponsored and submitted by Bayer AG, Leverkusen. Laboratory Study ID: 3467 HPO/046. Experiment start and end dates Sep. to Dec., 1990.

Final report issued Feb. 19, 1991.

Document No.: MRID 50119702 **Guideline:** Non-guideline

Statements: The study was not conducted in accordance with USEPA GLP standards (p. 3).

Signed and dated GLP and Data Confidentiality statements were provided (p. 2-3). No statements of Quality Assurance or Authenticity Certification were

provided.

Classification: This study is classified as Unacceptable. The material balances and identity and

quantity of transformation products were not reported. The details of the UV-

irradiation and any dark controls were missing.

PC Code: 129140

First EPA He Zhong, Ph.D. Biologist. Signature:

Reviewer: EFED Date: June 07, 2017

Secondary EPA Greg Orrick, RAPL Signature:

Reviewer: EFED Date: June 07, 2017

Executive Summary

A non-guideline, indirect aqueous photolysis study for benfluthrin (*i.e.*, transfluthrin) was conducted using a merry-go-round irradiation apparatus. The study reported a direct photodegradation half-life of 26 hours (k = 0.0268/h) for 0.44 mg transfluthrin in water/acetonitrile 1:1 (v:v) in the merry-go-round apparatus. The study author attributed the degradation to indirect mechanisms in connection with high light intensity in the apparatus and claimed that "*a direct photodegradation is not to be expected in light of the UV-absorption properties of benfluthrin.*" Additional half-lives for indirect photodegradation were reported to be 4.3 hours (k = 0.1609/h) for 0.16 mg benfluthrin at 1-ppm humic acid/water solution, 11.6 hours (k = 0.0599/h) for 0.41 mg benfluthrin at 10-ppm-Na-nitrate in water/acetonitrile 1:1 (v:v), and 8.7 hours (k = 0.0793/h) for 0.45 mg benfluthrin at 50-ppm-Na-nitrate in water /acetonitrile 1:1 (v:v) in the same apparatus. This study is classified as **Unacceptable** because of the study deficiencies listed below.

Study Deficiencies and Reviewer's Comments

- 1. Material balances were not reported.
- 2. As a semi-volatile compound, the loss of transfluthrin as vapor in test cuvettes was not reported.
- 3. The identity and quantity of the transformation products were not reported.
- 4. Results for dark controls for the test solutions were not reported.
- 5. Sample replication was not reported.
- 6. The UV wavelength and intensity used for the irradiation were unclear.
- 7. The rotation interval for each cuvette during 7 hours UV irradiation was unclear.